

**Statement of Chairman Reed E. Hundt
Re: Administration of Universal Service**

On May 8th of this year we voted unanimously to transform the universal service system of support as required by Congress in Section 254 of the 1996 Telecommunications Act. The new universal service system continues to ensure low rates for basic phone service across the country, while providing for a more efficient and competitively neutral collection and compensation scheme.

Fulfilling Congress' mandate, we also voted unanimously to commit up to \$2.25 billion a year in universal service funds to bring telecommunications services to our nation's classrooms and libraries and up to \$400 million a year in support for the provision of telecommunications services to rural public and non-for-profit health care facilities at rates comparable to those in urban areas. The \$2.25 billion annual fund for schools and libraries represents the largest investment this country has made on a national level in the infrastructure of our public school system in this century. Made wisely and well, this investment can truly be a transforming force that will put a world of resources at the disposal of even the poorest schools and libraries -- opening up new worlds of learning for every single child in the country -- regardless of income or location.

With this Order we establish a framework for universal service administration and implementation that recognizes the many significant changes in the system. The new framework paves the way for the effective, efficient and accountable administration of the fund to low income consumers, residents of high cost areas as well as to schools, libraries and rural health care facilities.

As the Joint Board recommended, in order to get the system up and running quickly, we appoint NECA as the interim administrator, subject to certain changes in its governance and structure that will render it more representative of a broad range of interests. Specifically, we direct NECA to create a separate, not-for profit, subsidiary (USAC) that will administer the support mechanisms for high cost areas and low income consumers as well as perform all billing and collection functions. We direct that the USAC board be comprised of a balanced and fair representation of all contributing and recipient carriers, state regulators and representatives of each of the intended beneficiaries.

We are altering, however, from our earlier determination that the universal service administrator should select a subcontractor to administer the fund temporarily with respect to schools, libraries and rural health care providers. Instead, we direct NECA to create two independent, non-profit corporations to manage most all aspects of the administration of the universal service fund with respect to schools, libraries and rural health care providers. These

corporations will be solely responsible for administering the application process for schools and libraries and rural health care providers, respectively, including disseminating, processing and reviewing applications for service, approving technology plans, creating and maintaining databases and websites on which applications for services will be posted for competitive bid, performing outreach and public education functions, making and submitting quarterly projections of demand for funding and conducting or authorizing the performance of audits. The establishment of these separate corporations will provide a management structure and expertise that is needed to ensure the effective administration of the universal service program for schools, libraries and rural health care facilities.

A majority of the Commission decided that this structure would better serve the goals of effective, efficient and accountable management and administration with respect to schools, libraries and rural health care facilities than the subcontractor approach we earlier adopted. I believe that this approach will also better serve those goals than the subcommittee approach suggested by Commissioner Chong in her dissenting statement.

Our decision to adopt this approach was based on thorough consideration of the merits of various operational structures including board committees, separate corporations, partnerships, associations and subcontractors. Our consideration was guided by the shared goals of establishing a system for rapid implementation and cost-effective, efficient and accountable administration of the program to meet the specialized needs of schools, libraries, rural health care providers, low income consumers and residents of high cost areas. I believe that the separate corporate structures outlined in the order will best achieve these goals for the reasons set forth below.

I. Separate Corporations will be more effective, accountable, and efficient than establishing a series of subcommittees of USAC.

A separate corporate structure will permit the continued existence of legally-cognizable and independent entities with sole responsibility and accountability for efficiently and effectively managing the administration of universal service funds to schools, libraries and rural health care facilities. Corporations are a desirable organizational structure generally because they provide limited liability for their shareholders and are treated as independent legal entities with the power to sue, to purchase or lease property, to lend or borrow money, to enter into contracts, and to make or alter by-laws. The corporate structure also provides an effective, established model for governing the complex relationships among the shareholders (or other beneficiaries), directors, officers, managers, creditors and others participating in the business of the corporation. The entities administering the universal service fund for schools, libraries and rural health care facilities must be able to exercise these powers if they are to operate effectively.

The separate corporate structure will also ensure greater clarity, simplicity and

efficiency of decision making. The lines of authority in a corporation are clear and direct; reporting runs from managers to a CEO to the Board of Directors. Accountability is clear and more direct. In a committee or subcontractor structure, the lines of authority are more convoluted and accountability is more diffuse. Under the committee approach it is unclear who the schools, libraries and health care staffs would report to -- directly to the board committee or through the CEO of USAC (who would also be answerable to the full USAC board).

In order to ensure that the universal service funds are invested wisely and efficiently, the entities responsible for administering funds for schools, libraries and rural health care facilities must be vested with clear management authority and responsibility to carry out all aspects of administration of the funds to these entities. Decisions about projected funding, prioritization of expenditures, approval of applications and long range planning must be made quickly, effectively and with accountability without being subjected to a burdensome bureaucratic process. In addition, given the broad representation of different groups on the USAC board, the entities charged with administering these aspects of the fund must have the unimpaired ability to vigorously defend themselves against legal challenges.

The continued existence of these separate corporations is also important to ensure continuity and efficiency in the administration of funds for schools, libraries and rural health care facilities. In order to ensure that the new funding mechanism is in place as quickly as possible, we have appointed NECA to serve as the temporary administrator. No decision has been made with respect to the permanent administrator. Because the schools/ libraries and health care corporations are separate legal entities, they will survive the dissolution of USAC in the event that NECA is not selected to serve as the permanent administrator. Under these circumstances, the schools/libraries and health care corporations could quickly and easily contract with the permanent administrator to continue administering the program for these entities. This would ensure the continued smooth operation of universal service support and eliminate the need to spend additional funds on redundant start up costs. The continuing role of the schools and health care corporations will also help to attract qualified personnel with the expertise necessary to effectively implement the program with respect to schools, libraries and rural health care providers. The continued involvement of these corporations will also provide incentives for better management in the early phases of the program and will provide incentives for more strategic, long-range planning and better use of resources.

II. Administration of funds to schools/libraries and rural health care providers through a sub-committee or division of the USAC Board would be administratively cumbersome and could undermine the effective administration of the program.

The USAC Board will have substantial representation from telecommunications carriers some of which have argued against or challenged the funding for schools and libraries and rural health care facilities. The USAC CEO will serve at the pleasure of that Board. Therefore, if we were to adopt a subcommittee structure, we would necessarily have to

devise a complicated and indirect reporting structure to preserve and protect the autonomy of the directors of the schools and health care subcommittees. Moreover, such management by a board committee is awkward and inefficient. Boards generally monitor rather than manage the day-to-day operations of most corporations. Thus, management by committee in this instance, would likely lead to less effective, efficient or accountable administration of funds.

Finally, I do not believe that the administration of universal service funds to schools, libraries or rural health care facilities through two separate corporations rather than through two separate USAC committees will result in either substantial delays or increased administrative costs. Differences in the way funds will be administered to and used by schools, libraries and rural health care providers will result in the need to establish separate processes and procedures and to hire specialized staffs with relevant expertise regardless of whether a committee or corporation structure is used. In any event, we direct that the separate corporations should contract with USAC or NECA to the extent necessary to maximize the efficient use of resources and to avoid overlapping expenses.

For the above stated reasons, I am confident that the administrative structure we establish today will help to attract highly qualified, appropriately reimbursed and competent management staff that will ensure accountable, cost-effective and efficient management of the significant resources at issue. Such a structure will thus ensure that universal service funds are invested wisely and effectively to bring the benefits of the information age to classrooms, libraries and rural health care facilities across the country.

**Separate Statement of
Commissioner James Quello**

*Re: Changes to the Board of Directors of the National Exchange Carrier Association, Inc.;
Federal-State Joint Board on Universal Service. CC Docket Nos. 96-45, 97-21.*

I support today's action by the Commission to designate the National Exchange Carrier Association as the temporary administrator of the universal service support mechanisms. I believe that the work of the Commission, especially the effort of the Common Carrier Bureau, and the Joint Board has been commendable. It is clear to me that the real effort in realizing the goals of the universal service program still lies ahead for the Commission, states, both temporary and permanent fund administrators, school districts, libraries, health care facilities, and particularly for telecommunications companies who seek to provide new services and enter new markets.

It is far from clear, however, that the corporate structure created by today's order is the only reasonable mechanism for performing these functions. For example, it is conceivable that administering the funds through committees may be superior to the approach contained in this order. The late date at which I was asked to consider this order complicated my opportunity to consider this option. Consequently, I support today's order with less enthusiasm and less confidence than I would like.

In the Universal Service Order, the Commission stated that the schools and libraries program would become operational on January 1, 1998. In reaching the decision to support the corporations model in this order, I placed considerable emphasis on appointing a temporary administrator in a timeframe that would permit us to meet this deadline. Further delays in appointing the temporary administrator would undermine the critical policy goal of getting the universal service program running on January 1, 1998.

I expect that the temporary administrator will perform, in an effective and thorough manner, the duties necessary to publicize the various programs and to estimate, collect, and distribute funding according to the rules we have adopted. The functioning of the temporary administrator in the coming months and years may demonstrate the wisdom of establishing separate corporations. I sincerely hope that it will.

**Separate Statement
of
Commissioner Susan Ness
Regarding Administration of Universal Service Mechanisms**

Today's order is another important step in our effort to ensure the fulfillment of the universal service objectives established by Congress. With major changes in the universal service system scheduled to become operational January 1, 1998, it is vital that we clear the way for implementation to begin.

Our order appoints NECA as the universal service administrator and provides for the creation of new organizations and procedures that are intended to ensure that the collection and distribution of universal service support is accomplished with efficiency and accountability. While we all have independent views on the structures and processes that would best serve these goals, what matters most at this critical time is to get the process underway. Unnecessary controversy or delay does not serve the interests of low-income consumers, consumers in high-cost areas, students, library users, or rural health care patients.

In my judgment, successful administration of the universal service programs has less to do with the precise structures and processes employed than with the quality of the people involved. Finding the people with the right skills and the necessary dedication to perform functions specific to the schools and libraries program, for example, is obviously essential, but I am at a loss to understand why this task will be more difficult, or time-consuming, as a result of our decision to assign these tasks to a separate corporation rather than a special subcommittee of the Universal Service Administrative Company (as our dissenting colleague now advocates) or a subcontractor to USAC (as the Joint Board had earlier recommended). But having carefully considered all three options, I have come to believe that in this respect we are making the choice that best serves our shared goals.

Use of separate corporations will ensure that the appropriate expertise is targeted to discrete and defined tasks. Decisionmaking will be streamlined, and bureaucracy reduced. This approach will also facilitate direct oversight by and accountability to this Commission, which in turn must account to the Congress and to the American people for the effective administration of the universal service programs. Efficient and cost-effective operations can be ensured by enabling the universal service entities to concentrate on what they do best, and to share resources whenever doing so will be consistent with efficient, responsible, and cost-

effective operations.

I would make no claim of perfection about the structure and processes and plans reflected in this order, even if my own preferences had been, or could be, accommodated at every turn. The plain fact, however, is that universal service administration, like the universal service rules, will necessarily evolve over time. We don't have all the answers today. We will know more later, but only if we get the process underway now.

We can and should adjust our plans as we -- along with industry and beneficiary groups -- learn from experience. For today, our task is to move forward constructively to get workable administrative mechanisms up and running.

Dissenting Statement**of Commissioner Rachelle B. Chong**

Re: *In the Matters of Changes to the Board of Directors of the National Exchange Carrier Association, Inc., Federal-State Joint Board on Universal Service, Report and Order and Order on Reconsideration, CC Docket Nos. 97-21, 96-45*

I respectfully dissent to today's Report and Order and Order on Reconsideration involving changes to the Board of Directors of the National Exchange Carrier Association, Inc. (NECA). While I remain fully committed to the success of the universal service support mechanisms and specialized programs contained in our May 7, 1997 Universal Service Report and Order (Universal Service Order), I object to this order because the majority casts aside the Joint Board's November 1996 decision to entrust NECA as the temporary administrator of the universal service program.¹⁸² Instead, the majority adopts a cumbersome new structure that will likely result in slower decision making and impose higher administrative costs on the Section 254(h) schools/library and rural health care programs. In addition, I have grave concerns about the implementation time necessary for the corporate structure adopted today. From a practical point of view, NECA does not have enough personnel to "loan" to USAC and the two new corporations in the short term, while it searches for high quality, full time officers and employees for the corporations. Given this late date, I fear the corporate structure chosen today may seriously endanger a timely start for our schools/library and rural health care programs.

Fiscal Responsibility for the Section 254(h) Programs Is Imperative

Throughout the implementation of the universal service provisions of the Telecommunications Act of 1996 (1996 Act), I have repeatedly said that we must not forget that "job one" is getting affordable, quality telephone service to every American household across the nation.¹⁸³ To that end, our highest priority should be ensuring that our universal

¹⁸² *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Recommended Decision, 12 FCC Rcd 87, paras. 832-33 (1996)(Joint Board Recommended Decision); *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, para. 866 (released May 7, 1997).

¹⁸³ Separate Statement of Commissioner Rachelle B. Chong, Concurring in Part, Dissenting in Part, Re: *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, at 6 (released May 7, 1997).

service programs encourage the highest level of subscribership, using mechanisms such as high cost assistance and low income programs, particularly for areas of chronically low subscribership.¹⁸⁴

In Section 254(h) of the 1996 Act, Congress also asked that the Commission collect money from every telecommunications carrier to fund two social programs to provide discounted telecommunications service to schools, libraries and rural health care providers. The benefits of such programs are clear.

In implementing Section 254(h), however, I believe we must balance our enthusiasm for such social programs against a sober regard for how much the costs of those programs mean to the basic telephone rates of an average consumer. If basic telephone rates go up because of the Section 254(h) social programs, how does this impact our overriding goal of achieving 100% subscribership in the underserved and unserved areas of the nation? While improving telecommunications services to the education, library and the rural health care communities is clearly an important goal, it is my view that our achievement of these social programs must not come at the detriment of other consumers.

Thus, in light of these concerns, I believe we have a duty to be fiscally responsible in our administration of the Section 254 support mechanisms. As to the Section 254(h) programs, we should be conservative in the administrative procedures that we set up, and ensure that it is efficient and nonburdensome. We must guard against waste, fraud and abuse by retaining administrative oversight where necessary. And finally, it is imperative that we set up all our procedures in a timely manner that allows the program to begin on January 1, 1998, as provided for in our Universal Service Order.

Keeping It Simple

I dissent to this item because, instead of taking a conservative and cost conscious approach, the majority has instead created an elaborate structure that is breathtaking in its breadth and complexity. While I can see a few benefits to this structure, I do not find that they outweigh the detriments, including increased costs of the corporate structure, increased implementation time, and more difficult accountability due to a more convoluted structure.

My preference for the structure of the interim universal service administrator would have been to have NECA establish USAC, and then form three *subcommittees* under USAC for the schools/library, rural health care and high cost/low income programs. This simple

¹⁸⁴ E.g., Native American tribal lands, very remote areas such as the Alaskan Bush, and insular areas such as Hawaii, the Commonwealth of the Northern Marianas Islands, Guam and Puerto Rico.

proposal, which was also NECA's preferred approach,¹⁸⁵ would have retained the benefits of having individuals administer the schools/library and rural health care programs that have "expertise" and a "direct stake in the success of the programs,"¹⁸⁶ but without the cumbersome corporate structure mandated by the majority decision. This structure would also have operated more efficiently by avoiding duplication of functions between the corporations and minimizing the amount of coordination needed among the multiple companies. Accountability is also retained in the subcommittee structure; each subcommittee would hire staff to run the day-to-day operations and would report to the particular USAC Board members serving on that subcommittee. These USAC Board members are responsible for the functions assigned to that subcommittee and would be directly accountable to the FCC pursuant to our authority over NECA.

The majority, however, has taken a more complicated route. First, they have created a large USAC Board consisting of 17 members. On this point, I would have preferred a smaller USAC Board. A smaller board would have been vastly more efficient, because it could achieve more nimble decision-making with lower administrative costs. Although I agree that the USAC Board should be composed of a broad cross-section of interested parties, I do not see the need for multiple members of certain industry groups or beneficiary groups, especially in light of the fact that the decision makes clear that USAC's duties are limited to administrative, non-substantive functions (such as billing and collection). Broad and fair representation could have just as easily been achieved with fewer Board members.¹⁸⁷

The Majority Plan May Be Impractical

I believe that the corporate structure adopted in this decision for operation of the schools/libraries and rural health care programs may be impractical because of two basic problems: cost and timing.

As to cost, I note that the Joint Board gave NECA the job of interim administrator because NECA has past expertise in billing and collecting money for our existing low income and high cost programs. The Joint Board (and subsequently the FCC) chose NECA because

¹⁸⁵ NECA *ex parte* letter, filed June 23, 1997.

¹⁸⁶ Majority decision at para. 58.

¹⁸⁷ It is unclear to me why information service providers (ISPs) are included on the USAC Board when ISPs are not mandatory contributors or beneficiaries to the universal service mechanisms, but are merely possible service providers to the Section 254(h) social programs. Others in a like position -- such as internal connection or "inside wire" providers - were not given a seat on USAC, but have just as much interest in the proceeding as the ISPs.

we believed it could get the job done quickly, efficiently and by our deadline.¹⁸⁸ But today, the majority changes the Joint Board's wise decision to give NECA the full responsibilities of interim administrator and instead, sets up two new corporations to handle the majority of the functions of the schools/library and rural health care programs.¹⁸⁹ I fear this unnecessary corporate structure will prove to be costly at ratepayer expense.

Moreover, setting up and operating two separate corporations unquestionably will be more costly than my proposed alternative of having a single USAC Board, with specialized subcommittees directing the Section 254(h) programs. Typically, nonprofit corporations have a Board of Directors and officers. Corporate officers often include a Chief Executive Officer (CEO), a Chief Financial Officer (CFO), and a Corporate Secretary.¹⁹⁰ Moreover, a corporate structure generally requires bylaws, articles of incorporation, the filing of annual reports, and other corporate activities required by law.

In light of all the above, I believe that the significant expenditures necessary to establish and maintain these two corporate structures may subject our programs to undue criticism, and may eat up funds that could better be used towards discounts on telecommunications services, Internet access, and internal connections by the schools, libraries and rural health care providers.

The second problem with this structure is time. Time is of the essence given our firm January 1, 1998, start date for the Section 254 programs.

At the outset, I must note my great disappointment that, even though the Commissioners were promised this draft decision by mid-February, 1997, in order to have time to consider these implementation issues carefully and still meet our start date for the Section 254(h) programs, it was not until June 20, 1997, that the Chairman's Office released the draft item for the full Commission's consideration. This delay has put significant time pressure on the Commission to put out this decision, and unreasonable time pressures on NECA to implement these changes, and put the mechanisms in place by our deadline.

¹⁸⁸ Universal Service Order at para. 866; Joint Board Recommended Decision at paras. 832-33.

¹⁸⁹ For example, the corporations have the functions of reviewing school and library applications and technology plans, creating and maintaining a web site, performing outreach and public education functions, reviewing bills for services, and submitting quarterly projections of demand and administrative expenses to the Commission.

¹⁹⁰ Corporations also often retain an executive director to oversee day-to-day operations, not to mention a general counsel.

In light of this delay on our part, it seems untenable that we are ordering NECA to establish this complex corporate structure at this time, because this structure will probably take more time to fully implement than we have at this moment. For example, I do not see how qualified officers for the corporations can be located, hired and brought on board quickly enough to begin our schools/library program by January 1, 1998.¹⁹¹ With a \$2.25 billion program at stake, a top quality CEO and CFO must be carefully selected from among qualified candidates. At a minimum, this executive search process will likely take several months. I see no reason to create this problem and I fear that it may result in the program being delayed from the current start date.

Given the importance of the Section 254(h) programs, this structure could be detrimental to the programs' success. Thus, I think we should have remained faithful to the recommendation of the Joint Board to give NECA the job of interim administrator, and we should have adopted a simpler structure utilizing subcommittees.

¹⁹¹ To find a qualified CEO of the schools/library corporation, USAC will need to conduct an executive search, interview numerous candidates, extend an offer, and if the candidate accepts, wait for the new officer to transition from his or her current job, and then give the officer time to come up to speed on the Commission's relevant orders and other USAC implementation actions.

APPENDIX A

PARTIES FILING INITIAL AND REPLY COMMENTS, CC DOCKET NO. 97-21

Initial Comments

<u>Commenter</u>	<u>Abbreviation</u>
American Library Association	ALA
Ameritech	
AT&T Corp.	AT&T
Bell Atlantic and NYNEX	BA and NYNEX
MCI	
National Cable Television Association	NCTA
National Exchange Carrier Association, Inc.	NECA
Pacific Telesis Group	PacTel
Personal Communications Industry Association	PCIA
Rural Telephone Coalition and Unites States Telephone Coalition	RTC and USTA
Southwestern Bell Telephone Company	SWBT
Sprint Corporation	Sprint
U S West, Inc.	U S WEST
Worldcom, Inc.	WorldCom

Reply comments

<u>Commenter</u>	<u>Abbreviation</u>
AT&T Corp.	AT&T
BellSouth Corp.	BellSouth
GTE Service Corp.	GTE
MCI	
National Exchange Carrier Association, Inc.	NECA
Personal Communications Industry Association	PCIA
Rural Telephone Coalition and Unites States Telephone Coalition	RTC and USTA
Southwestern Bell Telephone Company	SWBT

PARTIES FILING INITIAL AND REPLY COMMENTS, CC DOCKET NO. 96-45

Initial comments

<u>Commenter</u>	<u>Abbreviation</u>
Association of American Medical Colleges	AAMC
Ad Hoc Telecommunications Users Committee	Ad Hoc
Aerial Communications, Inc.	Aerial

American Federation of Teachers	AFT
American Hospital Association	AHA
AirTouch Communications, Inc.	AirTouch
AirTouch Communications, Inc. -- Errata	AirTouch
American Library Association	ALA
Alabama Department of Public Health, Public Health Area III	
Alabama Department of Public Health	
Alabama Public Service Commission	Alabama PSC
Alaska Public Utilities Commission	Alaska PUC
Alliance for Public Technology	
Alliance for Community Media	
Alliance for Distance Education in California	Alliance for Distance Education
ALLTEL Telephone Services Corporation	ALLTEL
Alpena General Hospital	
Association for Local Telecommunications Services	ALTS
American Telemedicine Association	American Telemedicine
Ameritech	
AMSC Subsidiary Corp.	AMSC
America Online	AOL
American Personal Communications	APC
American Public Health Association	APHA
American Public Power Association	APPA
Apple Computer, Inc.	Apple
Association of America's Public Television Stations and Public Broadcasting Service	APTS/PBS
Alaska Telephone Association -- Ex-Parte	ATA
Arch Communications Group, Inc.	Arch
Archdiocese of New York	
US Public Policy Office for the Association for Computing Machinery	Ass'n for Computing
Association of State and Territorial Health Officials	ASTHO
AT&T Corp.	AT&T
Bell Atlantic -NYNEX Mobile	BANM
Association of the Bar of New York Administrative Law Committee	Bar of New York
Bell Atlantic	
BellSouth Corporation and Telecommunications, Inc.	BellSouth
Benton Foundation & the Center for Strategic Communications	Benton
Broadband PCS Alliance of PCIA	Broadband PCS Alliance
Brooklyn Public Library	
Business Software Alliance	
California Department of Consumer Affairs	
State of California and the California	

Public Utilities Commission	California PUC
California Small Business Association	California SBA
Cathey, Hutton and Associates	Cathey, Hutton
US Catholic Conference	Catholic Conference
National Coalition for the Homeless.	
Washington Legal Clinic for the Homeless.	
American Women's Roundtable.	
Center for Media Education.	
Consumer Action.	
Fifth Street Connection.	
Heartland Alliance for Human Needs and Human Rights.	
Interstate Migrant Educators.	
Marcia Zashin.	
Education Consultant to Cleveland Public Schools and Project Act.	
Migrant Legal Action Program,	
Council for Education Development and Research	CEDR
Celpage, Inc	Celpage
Cincinnati Bell Telephone Co.	Cincinnati Bell
Citizens Utilities Company	Citizens Utilities
Commonwealth of the Northern Mariana Islands	CNMI
Colorado Library, Education & Healthcare Telecommunications	
Coalition	Colorado LEHTC
Commercial Internet Exchange Association	Commercial Internet Exchange
American Association of Community Colleges	Community Colleges
Competitive Telecommunications Association	CompTel
Comsat Corporation	Comsat
Cox Communications, Inc.	Cox
Competition Policy Institute	CPI
Citizens for a Sound Economy Foundation	CSE Foundation
Cellular Telecommunications Industry Association	CTIA
Cylink Corporation	Cylink
Office of the People's Counsel for the District of Columbia	DC OPC
Public Service Commission of the District of Columbia	DC PSC
Delaware Public Service Commission	Delaware PSC
Dickinson Public Schools	
DIRECTV, Inc. and Hughes Communications Galaxy, Inc.	DIRECTV
Eastern Montana Telemedicine Network	
Edgemont Neighborhood Coalition	Edgemont
Educations and Library Networks Coalition	EDLINC
American Association of Educational Service Agencies	Educational Service Agencies
Electronic Communications for Rural Health Depts.	
Evans Telephone Co.	Evans Tel. Co.
Humboldt Telephone Co.,	
Kerman telephone Co.,	

Oregon-Idaho Utilities Inc..	
Pinnacles Telephone Co..	
The Ponderosa Telephone Co..	
The Siskiyou Telephone Co..	
The Volcano Telephone Co..	
Excel Telecommunications. Inc.	EXCEL
Florida Department of Management Services	
Florida Public Service Commission	Florida PSC
Florida Public Service Commission -- Ex-Parte	Florida PSC
Ford County Health Department	
Fred Williamson & Associates, Inc.	Fred Williamson
Frontier Telemedicine	
Frontier Corp.	Frontier
General Communications, Inc.	GCI
GE American Communications, Inc.	GE Americom
Consumers' Utility Counsel Division,	
Georgia Governors' Office	Georgia Consumer's Counsel
Georgia Department of Administrative Services	
Governor of Guam	
Grant County Health Department	
Gray County Health Department	
Council of the Great City Schools	Great City Schools
General Services Administration	GSA
GTE	
Guam Telephone Authority	Guam Tel. Authority
GVNW, Inc./Management	GVNW
Harris, Skrivan Associates	Harris
Harvey County Health Department	
U.S. Department of Health and Human Services	HHS
High Plains Rural Health Network	High Plains RHN
ICORE, Inc.	ICORE
Illinois State Board of Education	Illinois Board of Education
Illinois Commerce Commission	Illinois CC
Illinois Department of Public Health	Illinois DPH
Illinois State Library	
Integrated Media Conferencing Network	
Interactive Services Association	Interactive Services Ass'n
Iowa Utilities Board	
iSCAN, L.P.	iSCAN
Information Technology Association of America	ITAA
ITCs, Inc.	ITC
Information Technology Industry Council	ITI
IXC Communications, Inc.	IXC Communications
John Staurulakis, Inc.	John Staurulakis

Juno Online Services, L.P.
 Kansas Corporation Commission
 Kansas Hospital Association
 Kentucky Public Service Commission
 Keystone Communications Corporation
 Kit Carson County Memorial Hospital
 LCI International Telecom Corp.
 Lower Colorado River Authority
 Livingston County Public Health Department
 Marquette County Health Department
 Maryland Public Service Commission
 Massachusetts Department of Education
 Massachusetts Board of Library Commissioners
 Maury Regional Hospital Teleradiology and
 Hospital Software Integration
 MCI
 Jennie M. Melham Memorial Medical Center, Inc.
 Metricom, Inc.
 MFS Communications Company, Inc.
 Mid-Nebraska Telemedicine Network
 Minnesota Independent Coalition
 Mississippi State Department of Health
 Mississippi Council for Education Technology &
 Mississippi Library Commission
 Missouri Public Service Commission
 Mitchell County Health Dept.
 Mountaineer Doctor TeleVision
 National Association of County & City Health Officials
 National Association of the Deaf
 National Association of State Telecom. Directors
 National Association of State Utility Consumer Advocates
 National Black Caucus of State Legislators
 National Urban Coalition
 US National Commission on Libraries
 & Information Science
 National Cable Television Association
 Nebraska Association of Hospitals & Health Systems
 Nebraska Telemedicine
 National Emergency Number Association
 National Urban Coalition
 NetAction
 Utility Consumer Action Network
 Community Technology Centers' Network
 CHALK

Juno Online
 Kansas CC

 Kentucky PSC
 Keystone Communications

 LCI
 LCRA

 Maryland PSC
 Massachusetts DOE
 MassLibrary

 Maury Regional Hospital

 Melham Medical Center
 Metricom
 MFS

 Minnesota Indep. Coalition
 Mississippi Dept. of Health

 Mississippi
 Missouri PSC

 Mountaineer Doctor TV
 NACCHO
 NAD
 NASTD
 NASUCA
 Nat'l Black Caucus

 NCLIS
 NCTA
 Nebraska Hospitals

 NENA

Netscape Communications Corporation	Netscape
New Jersey Division of Ratepayer Advocate	New Jersey Advocate
New York State Department of Education	New York DOE
New York State Department of Public Service	New York DPS
New York Public Library	
Nextel Communications, Inc.	Nextel
Northern Telecommunications	NorTel
North Dakota Department of Health	North Dakota DOH
North Dakota Public Service Commission	North Dakota PSC
North Dakota State Library	
North Dakota Telehealth Service Providers	
Northern Tier	
Norton County Health Department	
NRPT Communications	NRPT
National Telecommunications and Information Administration	NTIA
American College of Nurse Practitioners	Nurse Practitioners
Nynex	NYNEX
Ohio Department of Education	Ohio DOE
Public Utilities Commission of Ohio	Ohio PUC
Oracle Corporation	Oracle
Oregon Public Education Network	
Oregon Public Utility Commission	Oregon PUC
Orion Atlantic	
Osage County Health Department	
Osborne County Health Department	
Owen J. Roberts School District	
PACE Telecommunications Consortium	PACE
Pacific Telesis Group	PacTel
PageMart, Inc.	PageMart
Paging Network, Inc.	PageNet
PanAmSat Corporation	PanAmSat
Panhandle Health District I	
Personal Communications Industry Association	PCIA
Personal Communications Industry Association -- Errata	PCIA
Pennsylvania Library Association	Pennsylvania Library Ass'n
People for the American Way	People For
Media Access Project,	
Alliance for Communications Democracy,	
Alliance for Community Media,	
Benton Foundation,	
Center for Media Education,	
League of United Latin American Systems,	
Minority Media and Telecommunications Council,	

National Association for the Advancement of Colored People.	
National Council of LaRaza.	
National Urban League.	
Rainbow Coalition	
Phillips County Health Department	
Plains Health Telemedicine Network	Plains Health Telemedicine
Paging and Narrowband PCS Alliance of the PCIA	PNPA
Pottawatomie County Health Department	
Public Advocates, Inc.	Public Advocates
Puerto Rico Telephone Company	Puerto Rico Tel. Co.
Rural Emergency Medical Education Consortium	REMEC
Richard Roth	
Robert L. Lock, Jr.	
Roseville Telephone Company	Roseville Tel. Co.
RT Communications, Inc.	RT
Rural Telephone Coalition	RTC
Rural Alliance	
National Rural Electric Cooperative Association	Rural Electric Coop.
Rural Wisconsin Health Cooperative	
Rural Utilities Service	RUS
Russell County Health Department	
Chief Counsel for Advocacy of the	
US Small Business Administration	SBA
Chief Counsel for Advocacy of the	
US Small Business Administration -- ERRATA	SBA
SBC Communications, Inc.	SBC
Seattle Department of Administrative Services	Seattle
Sheridan County Public Health Department	Sheridan County PHD
Silver Star Telephone Company	Silver Star Tel. Co.
Southern New England Telephone Co.	SNET
South Carolina Department of Education and	
Budget & Control Board	South Carolina
Southern Adirondak Library System	
Southern Illinois Healthcare	
Sprint Spectrum L.P.	Sprint PCS
Sprint Corporation	Sprint
Saint Alexius Medical Center	St. Alexius
Stanton County Health Department	
TCA, Inc.-Telecommunications Consultants	TCA
Tele-Communications, Inc.	TCI
TDS Telecommunications and Century Telephone	TDS Telecom
TDS Telecommunications and Century Telephone -- Errata	TDS Telecom
Telco Communications Group, Inc.	Telco
Teleport Communications Group, Inc.	Teleport

Public Utility Commission of Texas
 Time Warner Communications Holdings, Inc.
 Telecommunications Resellers Association
 Tularosa Basin Telephone
 Utility Reform Network
 U S West, Inc.
 United Cerebral Palsy Association
 Office of Communication of the United Church of Christ
 United Health Services
 United Utilities, Inc.
 Universal Service Alliance
 University of Cincinnati Medical Center Academic
 Information Technology and Libraries
 University of Kansas School of Nursing
 Nursing
 University of Minnesota
 University of Nebraska Medical Center
 University of Nevada School of Medicine
 National Urban League, Inc.
 United States Telephone Association
 Utah Public Service Commission
 UTC, the Telecommunications Association
 Vanguard Cellular Systems, Inc.
 Vermont Public Service Board
 Virginia's Rural Telephone Co's
 Washington State Enhanced 911 Program
 Washington State Library
 Washington State Rural Development Council
 Washington State Superintendent of Public Instruction
 Washington Utilities and Transportation Commission
 Waubensee Community College
 West Virginia Consumer Advocate
 Western Alliance
 WinStar Communications, Inc.
 WorldCom, Inc.
 Wyoming Medical Center
 Wyoming Public Service Commission

Texas PUC
 Time Warner
 TRA
 Tularosa Basin Tel.
 TURN
 U S WEST
 United Cerebral Palsy Ass'n
 United Church of Christ

 United Utilities

 Univ. of Cin. Medical Center
 Univ. of Kansas School of

 Univ. of Minnesota
 Univ. of Nebraska Med. Ctr.

 Urban League
 USTA
 Utah PSC
 UTC
 Vanguard
 Vermont PSB
 Virginia's Rural
 Washington 911
 Washington Library
 Washington RDC
 Washington SPI
 Washington UTC

 WinStar
 WorldCom
 Wyoming Telemedicine Proj.
 WPSC

Reply comments

Commenter

Acadia-St. Landry Hospital
 America's Carriers Telecommunications Ass'n
 Ad Hoc Telecommunications Users Committee

Abbreviation

ACTA
 Ad Hoc

American Federation of Teachers	AFT
American Hospital Ass'n	AHA
AirTouch Communications, Inc.	AirTouch
American Library Association	ALA
Alaska Telemedicine Project	
Aliant Communications Co.	Aliant
ALLTEL Telephone Services Corporation	ALLTEL
Association for Local Telecommunications Services	ALTS
American Medical Informatics Association	
Ameritech	
America Online	AOL
American Personal Communications	APC
American Public Power Ass'n	APPA
Apple Computer, Inc.	Apple
Arch Communications Group, Inc.	Arch
Arizona Telemedicine Program Link	Arizona Telemedicine
Arkadelphia Baptist Medical Center	
Arlington Municipal Hospital TeleMedicine	Arlington Municipal Hospital
AT&T Corp.	AT&T
Atlanta Board of Education	
Bell Atlantic and NYNEX	BANX
Bassett Healthcare Telemedicine Network	Bassett Healthcare
BellSouth Corporation and Telecommunications, Inc.	BellSouth
Benton Foundation & the Center for Strategic Communications	Benton
Business Software Alliance	
California Department of Consumer Affairs	
California and the Public Utilities Commission	California PUC
California Small Business Association	California SBA
Celpage, Inc.	Celpage
Centennial Cellular Corp.	Centennial
Charles S. Robb	
City of Chicago	Chicago
Citizens Utilities Company	Citizens Utilities
Resident Representative from CNMI to US	CNMI Representative
Northern Mariana Islands	CNMI
Colorado Library, Education & Healthcare Telecommunications Coalition	Colorado LEHTC
Colorado Public Utilities Commission	Colorado PUC
Colorado Telehealth	Colorado Telehealth
Commercial Internet Exchange Association	Commercial Internet Exchange
Commercial Internet Exchange Association -- ERRATA	Commercial Internet Exchange
American Association of Community Colleges	Community Colleges
Conejos County Hospital	

Consumer Action Network	Consumer Action
Cox Communications, Inc.	Cox
Competition Policy Institute	CPI
Cellular Telecommunications Industry Association	CTIA
Communications Workers of America	CWA
Dakota Telemedicine Systems	
Decatur County Hospital Healthnet Works	Decatur County Hospital
Eastern Montana TeleMedicine Network	Eastern Montana TeleMedicine
Educations and Library Networks Coalition	EDLINC
Evans Telephone Co.	Evans Tel. Co.
Humboldt Telephone Co.,	
Kerman telephone Co.,	
Oregon-Idaho Utilities, Inc.	
Pinnacles Telephone Co.,	
The Ponderosa Telephone Co.,	
Siskiyou Telephone Co.,	
The Volcano Telephone Co.	
Florida Public Service Commission	Florida PSC
Fort Frye Local School District	
General Communications, Inc.	GCI
GE American Communications, Inc.	GE Americom
Georgia Public Service Commission	Georgia PSC
General Instrument Corporation	GI
Council of the Great City Schools	Great City Schools
General Services Administration	GSA
GTE	GTE
High Plains Rural Health Network	High Plains RHN
U.S. Department of the Interior	Interior
ITCs, Inc. -- ERRATA	ITC
ITCs, Inc.	ITC
IXC Communications, Inc.	IXC Communications
University of Kentucky College of Medicine	Kentucky TeleCare
KMC Telecom, Inc.	KMC
KU Medical Center	KU Medical Center
La Crosse Lutheran Hospital	
LBJ Tropical Medical Center	
Low Country General Hospital	
Lufkin-Conroe Telephone Exchange, Inc.	Lufkin-Conroe
The State of Maine Public Utilities Commission	Maine PUC
The State of Montana Public Service Commission,	
The State of Nebraska Public Service Commission,	
The State of New Hampshire Public Utilities Commission,	
The State of New Mexico State Corporation Commission,	
The State of Utah Public Service Commission,	

The State of Vermont Department of Public Service and Public Service Board.	
Public Service Commission of West Virginia	
Upper Peninsula Telemedicine Network	Marquette General Hospital
Maryland PSC	
MCI	MCI
MFS Communications Company, Inc.	MFS
Building an Integrated Patient Information System	Mid-Michigan Medical Center
Montana REACH	
Motorola, Inc.	Motorola
National Cable Television Ass'n	NCTA
Netscape Communications Corporation	Netscape
New York State Department of Public Service	New York DPS
Friends of the National Library of Medicine	NLM
North Idaho Community Education and Health Information Network	North Idaho CEHIN
North Mississippi Health Services	
North Tonawanda City School District Board of Education	North Tonawanda School Dist.
National Telecommunications and Information Administration	NTIA
Public Utilities Commission of Ohio	Ohio PUC
Orion Atlantic	
Pacific Telesis Group	PacTel
PageMart, Inc.	PageMart
Paging Network, Inc.	PageNet
Personal Communications Industry Association	PCIA
Puerto Rico Telephone Company	Puerto Rico Tel. Co.
Rock Hill Telephone Co.	Rock Hill Tel. Co.
Rural Telephone Coalition	RTC
National Rural Telecom Association	
National Telephone Cooperative Association	
Organization for the Promotion and Advancement of Small Telecommunications Companies	
Rural Alabama Health Alliance Distance Learning/ Medical Link Grant	Rural Alabama Health
Alliance	
National Rural Health Association	Rural Health Ass'n
Rural Utilities Service	RUS
Acadia-St. Landry Hospital,	
Arizona Telemedicine Program Link,	Arizona Telemedicine
Arkadelphia Baptist Medical Center,	
Arlington Municipal Hospital TeleMedicine,	Arlington Municipal Hospital
Bassett Healthcare Telemedicine Network,	Bassett Healthcare
Colorado Telehealth,	
Conejos County Hospital,	
Dakota Telemedicine Systems,	

Decatur County Hospital Healthnet Works.	Decatur County Hospital
Eastern Montana TeleMedicine Network,	Eastern Montana Telemedicine
High Plains Rural Health Network.	
KU Medical Center.	
University of Kentucky College of Medicine.	Kentucky Telecare
LBJ Tropical Medical Center.	
La Crosse Lutheran Hospital.	
Low Country General Hospital.	
Upper Peninsula Telemedicine Network.	Marquette General Hospital
Building an Integrated Patient Information System.	Mid-Michigan Medical Center
Montana REACH.	
National Telecommunications and Information Administration.	NTIA
North Idaho Community Education & Health Network,	North Idaho CEHIN
North Mississippi Health Services,	
Rural Alabama Health Alliance Distance Learning,	Rural Alabama HealthAlliance
National Rural Health Association,	Rural Health Ass'n
Northeast Louisiana Health Network Teleradiology Link.	St. Francis Medical Center
Twin Lakes Regional Medical Center,	
University of Arkansas Rural MedLink.	University of Arkansas
Rural Pennsylvania Telemedicine Network,	Univ. Pittsburgh Med Ctr
Telemedicine for Rural South Carolina	Univ. of SC School of Med'
U.S. Small Business Administration	SBA
SBC Communications, Inc.	SBC
Scott & White	
Small Cable Business Association (Reg. Flex)	Small Cable II
Small Cable Business Association	Small Cable
Sprint Spectrum L.P.	Sprint PCS
Sprint Corporation	Sprint
Northeast Louisiana Health Network Teleradiology Link	St. Francis Medical Center
TDS Telecommunications and Century Telephone	TDS Telecom
Telco Communications Group, Inc.	Telco
Teleport Communications Group, Inc.	Teleport
Time Warner Communications Holdings, Inc.	Time Warner
Telecommunications Resellers Association	TRA
Twin Lakes Regional Medical Center	
U S West, Inc.	U S WEST
Universal Service Alliance	Univ. Service Alliance
University of Arkansas Rural MedLink	Univ. of Arkansas
University of Kentucky Center for Rural Health	
Rural Pennsylvania Telemedicine Network	Univ. of Pittsburgh Medical
Center	
Telemedicine for Rural South Carolina	Univ. of S. Carolina School of
Med.	
United States Telephone Ass'n	USTA

UTC, the Telecommunications Ass'n
Vanderbilt University
Vanguard Cellular Systems, Inc.
WorldCom, Inc.

UTC
Vanderbilt
Vanguard
WorldCom